

R. Keramati, SBN# 182425  
Western Legal Group, APC.  
110 West C. Street, Suite 1300  
San Diego, California 92101  
Telephone (619) 231-2529  
Facsimile (619) 231-2528

Attorney for: TOMAS IGNACIO-SANTIAGO

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE NITA L. STORMES)

<b>UNITED STATES OF AMERICA,</b>	)	Criminal Case No. <b>08cr640-IEG (NLS)</b>
	)	
Plaintiff,	)	
	)	
vs.	)	DECLARATION OF RAY KERAMATI IN
	)	SUPPORT OF MOTION REQUESTING
<b>Arael GUZMAN-Rodriguez (1),</b>	)	THE ORDERING OF A VIDEO
<b>Misael GARCIA-Leon (2)</b>	)	DEPOSITION OF JUAN TOMAS
	)	IGNACIO-SANCHEZ
	)	
Defendant(s)	)	DATE: April 8, 2008
	)	TIME: 9:30 a.m.
	)	JUDGE: Honorable Nita L. Stormes
	)	

I, Ray Keramati, declare as follows:

1. I am an attorney duly licensed to practice before the courts of the State of California and I am counsel of record for Mr. Tomas Ignacio-Sanchez. If called as a witness herein, I could and would competently testify to the facts set forth herein.

2. Mr. Ignacio-Sanchez has been in custody since February 22, 2008.

3. Mr. Ignacio-Sanchez' incarceration has placed a great hardship on him.

4. Mr. Ignacio-Sanchez does not have a surety to post a material witness appearance bond for his release.

1           5. I am requesting that the court order a video deposition hearing to be held to secure the  
2 testimony of Mr. Ignacio-Sanchez as soon as practicable.

3           I declare under the penalty of perjury under the laws of the United States of America that  
4 the foregoing is true and correct. Executed at San Diego, California on March 21, 2008.

5  
6 DATED: March 21, 2008

/s/ Ray Keramati  
R. Keramati, Esq.  
Attorney for Material Witness  
TOMAS IGNACIO-SANTIAGO